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VICTOR KNAPP, ESQ.

Attorney at Law

125-10 Queens Boulevard
Suite 323

Kew Gardens, New York 11415

Telephone: 718-263-9000 Fax: 718-793-6975

VK989@victorknapp.com

Honorable Colleen McMahon
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, N.Y. 10007-1312

April 26th, 2023

VIA ECF

Re: United States vs. Jenny Fernandez Nataren, et al 20-cr-659

Dear Judge MacMahon,

The defendant Jenny Fernandez Nataren resides in the State of Georgia. Her conditions of release include home detention (with the exception for employment, attorney visits and court appearances) as well as location monitoring (GPS device) since her initial arrest. She is also subject to further bail conditions that limit and restrict her ability to travel.

I have been advised by Ms. Nataren and her family that her mother (grandmother to the defendant's children) is visiting the United States from the Honduras and that the family has planned a get together party to honor her this Friday, April 28th, 2023, at the Diamond City Event Hall located at 4771 Britt Rd., Norcross, Georgia 30093. Ms. Nataren and her family have not seen her mother for over three years and would very much like to be able to attend this celebration.

The location is approximately a one hour and twenty-five minute drive from the defendant's residence. She is requesting that her bail conditions be modified to the extent that she be allowed to attend this event and return home at 4:00 am Saturday morning.

I have communicated with Officer Courtney DiFeo from Pre-trial Services who has indicated that a 4:00 am extension falls outside of their policy for a curfew and suggests a request to the Court for a one-time modification for that date and time to allow Ms. Nataren to be out that late.

I have also communicated with Probation Officer Rebekah Weiller from Pre-Trial Services who has indicated that the defendant's staying out until 4am is outside of their policy of allowed activities and cannot be approved without the Court's involvement. However, Officer Weiller did indicate that the ND/GA has no objection to a defense request for a modification to "stand alone location monitoring", where the defendant would still be wearing the GPS monitoring equipment but would not be confined to the curfew schedule restrictions and could come and go as she pleases with her employment and social activities.

Accordingly, it is my request that the Conditions of Release regarding the defendant's home arrest be modified to the extent of imposing "stand alone location monitoring", where the defendant would still be wearing the GPS monitoring equipment but would not be confined to the curfew schedule restrictions.

Alternatively, it is requested that the defendant be allowed to attend the aforesaid event on Friday (April 28th, 2023) and return home at 4:00 am Saturday morning.

Thank you for your time and consideration herein.

Very Truly Yours,



Victor Knapp

THE FOREGOING MOTION IS: 4/26/23

APPROVED *Home arrest modified to "Stand alone location monitoring!"*
 DENIED

APPROVED AS FOLLOWS:

